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June 5, 2008

SO ORDERED

VIA TELEFAX 212-805-6737

The Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

George B. Daniels
HON. GEORGE B. DANIELS

JUN 09 2008

RE: St. Paul Fire & Marine Insurance Company a/s/o Kanan Fashions, Inc.
v. American Airlines, Inc.
Docket No.: 07 Civ 10593 (GBD)

Honorable George B. Daniels:

We represent the plaintiff St. Paul Fire & Marine Insurance Company in the captioned matter and write this letter with the consent of defense counsel, Francis Montbach, in requesting a sixty (60) day extension to the current discovery deadline of June 11, 2008.

In conferring with opposing counsel, it is apparent we will not be able to complete the required discovery within the current deadline of June 11, 2008. It appears depositions will be required of witnesses out of state in Chicago, Illinois, and that deposition can not take place within the current discovery completion date. The parties jointly request that the current discovery deadline of June 11, 2008 be extended for sixty (60) days to August 8, 2008.

This is the first request for an extension of the discovery deadline, and extending the date to August 8, 2008 will not affect the remainder of the dates set forth in the Scheduling Order dated November 30, 2007.

Counsel for both plaintiff and defendant respectfully request that your Honor favorably consider this request for an extension of the discovery deadline to August 8, 2008, so the necessary discovery out-of-state can be completed.

Respectfully submitted,
BADIAK & WILL, LLP

[Signature]
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